

**EXHIBIT “A”****RICO STATEMENT****QUESTION #2**

<b>DEFENDANT</b>	<b>MISCONDUCT</b>	<b>BASIS OF LIABILITY</b>
Dubai Islamic Bank	<p>Dubai Islamic Bank was directly involved in the 9/11 attacks. Mustafa Ahmed al-Hisawai (Sheikh Saeed), bin Laden’s chief financial officer, lived in the Emirates from June 2001 until September 11, 2001, when he fled for Karachi, Pakistan. U.S. authorities have identified at least \$500,000 that flowed from his accounts to the 19 hijackers, including hundreds of thousands of dollars in money transfers from Dubai Islamic Bank (and its affiliate and correspondent, Standard Chartered Bank) to two of the hijackers since at least June 1999, to pay for their flight training and expenses. These transactions were carried out in violation of international standards adopted to prevent money laundering, including the 40 Recommendations on Money Laundering adopted in 1990 by the international Financial Action Task Force, of which the UAE is a member.</p> <p>The hijackers also use Dubai Islamic Bank to donate to Muslim charities. For example, an agreement for automatic withdrawal dated July 25, 1999, indicates that hijacker Marwan al Shehhi donated money to Darbar Charity. The money was transferred from Hong Kong Shanghi Bank account no. 61052114001 into Dubai Islamic Bank account no. 1520449474101.</p> <p>Dubai Islamic Bank has knowingly and repeatedly lent material support to the Enterprise, including the knowing and intentional provision of financial and banking services to several known al Qaeda operatives. So pervasive and apparent was the Bank’s money laundering on behalf of the Enterprise that in 1999, American officials visited Dubai to demand that the government take steps to end its lax supervision of the Bank. According to a July 8, 1999 State Department press conference, Bank involvement with terrorist money laundering was the key concern.</p> <p>That same day, the New York Times reported that the CIA had obtained evidence that bin Laden had been allowed to funnel money through the Dubai Islamic</p>	1962(a) 1962(c) 1962(d)

	<p>Bank. A preliminary 2002 analysis of the Dubai banking and financial services industry conducted by NATO revealed that al Qaeda “had previously used the Dubai Islamic Bank” and other means “to fund the bombings of the American embassies in Kenya and Tanzania.”</p> <p>Shortly after the 9/11 Attack, the Central Bank of the UAE froze the accounts of various persons and organizations suspected of ties with the Enterprise, including Dubai Islamic Bank. Similarly, Luxembourg’s commission for supervising financial institutions issued a regulatory alert announcing Dubai Islamic Bank’s ties to Osama Bin Laden.</p> <p>Dubai Islamic Bank has been a key shareholder in other banks well-known for their involvement in laundering money on behalf of the Enterprise, including the Bank of Credit and Commerce International (BCCI), Tadamon Islamic Bank and Baraka Islamic Bank, an affiliate of Al Baraka Bank.</p> <p>Despite all these warnings, Dubai Islamic Bank continued to maintain those accounts and Bank knowingly provided financial services and other forms of material support to al Qaeda, while disregarding warnings and refusing to adhere to even minimal banking industry standards designed to thwart the support of terrorist networks like the Enterprise through anti-terrorist and money laundering safeguards and “know your customer” regulations.</p> <p>Dubai Islamic Bank has laundered money for al Qaeda, knowingly and intentionally provided financial services to al Qaeda including the maintenance of bank accounts, and directly facilitated the training of the September 11 hijackers.</p> <p>Dubai Islamic Bank thereby has, for a period of many years, provided critical financial and logistical support to al Qaeda to support that terrorist organization’s global jihad. The September 11th Attack was a direct, intended and foreseeable product of Dubai Islamic Bank’s participation in al Qaeda’s jihadist campaign.</p>	
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